

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ROBERT E. MORLEY, JR., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No. 4:14-CV-00172 CDP
	)	
SQUARE, INC., et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants Square, Inc., Jack Dorsey, and James McKelvey, Jr., respectfully request the Court for an extension of time up to and including April 24, 2014, within which to answer or otherwise respond to Plaintiffs' Complaint. In support of their Motion, Defendants state as follows:

1. Plaintiffs filed a 12-count Complaint consisting of 194 paragraphs of allegations (see Doc. #1) and more than 500 pages of exhibits (see Doc. #1-1 to 1-14).
2. On February 18, 2014, Defendants filed a Consent Motion for Extension of Time to File Responsive Pleading, which sought until March 27, 2014 to answer or otherwise respond to the Complaint. See Doc. #15. On February 19, 2014, the Court granted the Motion. See Doc. #16.
3. Defendants have obtained new counsel to represent them in this dispute. Edward L. Dowd, Jr. and Jennifer S. Kingston entered their appearance on March 10,

2014 and previous counsel, Michael Kahn, filed his Notice of Withdrawal on March 13, 2014. See Docs. #19, 20, 22. Additional newly obtained counsel will be moving to appear pro hac vice on behalf of the Defendants in the near term.

4. The requested extension of time will provide Defendants' new counsel additional time to analyze the lengthy allegations and prepare a responsive pleading.

5. Accordingly, Defendants respectfully request an extension of time to file their responsive pleading up to and including April 24, 2014. Defendants do not seek this extension for any undue delay and agree that, in exchange for Plaintiffs' consent, Defendants will seek no further extensions relating to their responsive pleading to the Complaint.

6. Plaintiffs' counsel consents to this extension of time.

WHEREFORE, Defendants respectfully request that the March 27, 2014 deadline for filing a responsive pleading be extended to April 24, 2014.

Dated: March 20, 2014

By: /s/ Jennifer S. Kingston  
Edward L. Dowd, Jr., #28785  
Jennifer Kingston, #93569  
Dowd Bennett LLP  
7733 Forsyth Blvd., Suite 1900  
St. Louis, Missouri 63105  
Telephone: (314) 889-7300  
Facsimile: (314) 863-2111

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was served via ECF on March 20, 2014, upon all counsel of record.

/s/ Jennifer S. Kingston